

Michigan Department of Community Health

Summary of new rules: “Reporting of Non-suicidal, Non-medicinal Chemical Poisoning” (R 325.71-R 325.75) - Effective date: September 18, 2007

The Michigan Department of Community Health (MDCH) has promulgated new rules to mandate reporting of non-suicidal, non-medicinal chemical poisoning (hereafter referred to as chemical poisoning). The purpose of these rules is to place poisoning from environmental or occupational chemical exposures or related to chemical terrorism under public health surveillance so that follow-up actions can be taken to prevent further morbidity and mortality from similar chemical exposures. These rules exclude reporting of chemical poisonings that are self-inflicted and that are related to drugs or other medicinals because strategies for prevention are beyond the scope of the intent of these rules.

There are approximately 55,000 calls to the two poison control centers in the state, approximately 400 hospitalizations, and 300 deaths associated with these types of poisonings annually in Michigan. Most of these poisonings are preventable with the appropriate interventions and education. Carbon monoxide alone accounts for approximately 20 deaths a year in the state, and almost all of those could be prevented with the use of carbon monoxide detectors in the home or proper installation and use of equipment with combustion engines, such as generators and forklifts.

Although some chemical poisonings data are available, there is insufficient information in existing data sources to determine the causes of these incidents and thus insufficient information to target prevention activities. By mandating reporting of personal identifiers and diagnostic information, these rules allow MDCH and its local public health partners to conduct the detailed epidemiologic follow-up necessary to ascertain cause. These rules follow traditional public health surveillance practice first established for communicable disease, whereby individuals with an illness are reported to public health and public health conducts an investigation to determine the scope and magnitude of the problem and appropriate prevention interventions.

These rules have one feature that distinguishes them from other mandatory public health reporting systems. **They specify that health professionals and health facilities are required to report only when asked to do so by MDCH or a local health department.** This reduces the burden of reporting, and allows MDCH and local health departments to target resources to poisonings of immediate public health concern. The three conditions of concern currently at MDCH include pesticide poisoning, carbon monoxide poisoning, and acute inhalation injury from exposures to fumes and vapors.

These rules also permit health professionals and health facilities to report without MDCH or local health department request. This allows them to alert public health officials of potential public health problems, including those potentially related to acts of terrorism, within the public health exemption to the confidentiality requirements of the Health Insurance Portability and Accountability Act (HIPAA).

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